

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Andrei PONOMARENKO	Group:	2141
Appl. No.:	10/066,033	Examiner:	K. Shingles
Filed:	January 31, 2002	Atty. Docket No.:	10.0529
For:	SYSTEM FOR MANAGING CONFIGURATION MEMORY WITH TRANSACTION AND REDUNDANCY SUPPORT IN AN OPTICAL NETWORK ELEMENT		

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450 USA

APPELLANT'S REPLY TO EXAMINER'S ANSWER

In response to the Examiner's Answer mailed March 13, 2008 in the above identified application, the Appellant respectfully submits this Reply.

/Christopher L. Bernard/

Christopher L. Bernard
Reg. No.: 48,234

Lawrence A. Baratta Jr.
Reg. No.: 59,553

Attorneys for Appellant

Clements Bernard Miller
1901 Roxborough Road, Suite 300
Charlotte, North Carolina 28211 USA
Telephone: 704.366.6642
Facsimile: 704.366.9744
cbernard@worldpatents.com

ARGUMENTS

Appellant respectfully submits that Claims 10-30 are patentable over the combinations of Axberg *et al.* and Davis *et al.* and Axberg *et al.*, Davis *et al.*, and Traversat *et al.* Appellant's invention provides a managed configuration database within a network management program for a SONET ring network. Examiners' arguments with respect to the combinations above are flawed as these fail to meet the claimed language and these references are inapplicable to management of a SONET ring network with managed objects.

Axberg *et al.* is a network configuration program which assists a user in planning the configuration of devices in an information processing network, i.e. disk drives or other storage elements.¹ Examiner aptly notes Axberg *et al.* does utilize objects for interconnecting relationships between different representations of physical objects which make up the network of storage elements.² However, management in Axberg *et al.* is limited to creating and configuring ports on storage elements.

Davis *et al.* is an element management system which includes a core set of element-independent functionalities such that multiple different network elements from different manufacturers can be managed at a high level.³ Examiner aptly notes that Davis *et al.* does teach SONET as one exemplary protocol. However, Davis *et al.* is not a SONET element management system (EMS), but rather an management consolidation device configured to consolidate elements using multiple different protocols and from multiple different vendors.

¹ U.S. Pat. No. 6,009,466 Abstract

² U.S. Pat. No. 6,009,466 Col. 7, lines 25-30

³ U.S. Pat. No. 6,260,062, Abstract

§103(a) Rejection – Claims 10-12 and 21 - Axberg *et al.* and Davis *et al.*

Appellant respectfully submits that the storage devices (i.e., disk drives) of Axberg *et al.* are clearly distinct from SONET optical rings. Examiner has argued that Axberg *et al.* suggests implementation with other communication networks besides storage elements. However, Axberg *et al.* specifically enumerates these other implementations as Token Ring and Wireless Local Area Networks (WLANs) as pointed out by the Examiner.⁴ SONET optical networks are required to operate at orders of magnitude higher levels of reliability than storage elements, Token Ring, WLANs, etc. Appellant respectfully submits that Examiner's argument is flawed that it would be obvious to combine Axberg *et al.* and Davis *et al.*

Specifically, Appellant details the system implementation of SONET optical networks in the specification on pages 7 – 10. Appellant's "managed objects" in claims 10-12 and 21 pertain to objects within the SONET network. These objects have an entirely different set of management requirements than objects related to a storage device (i.e. disk drive). A managed object, as defined by Claim 10, represents a logical representation of network entities that can be configured and modified through transactions executed by the network management program of the present invention.

In Appellant's specification, Appellant explains the limitations of conventional SONET management systems.⁵ Specifically, conventional systems and methods require complex code to manage all the objects and there is a lack of efficient persistency support (i.e., superior fault protection operation). Appellant's present invention provides a solution to both these limitations. The combination of Axberg *et al.* and Davis *et al.* fails to disclose, teach, or suggest solutions to both of these limitations.

Additionally, the element in Claim 10 of "a database manager that receives transaction commands from the agent process" cannot be met by the disclosure of Axberg

⁴ U.S. Pat. No. 6,009,466 Col. 4, lines 28-41

⁵ Specification, pages 2-3

et al. since Axberg *et al.* has no disclosure that an agent process sends transaction commands. Axberg *et al.* further does not disclose a database file that stores commands or a transaction log file that stores actions included within transactions.

Davis *et al.* is cited as a SONET element management system. Appellants respectfully submit that Davis *et al.* is an element management system consolidator, and not a stand alone element management system. Davis *et al.* fails to disclose managing SONET network elements as claimed by Appellants.

§103(a) Rejection – Claims 13-20 and 22-30 - Axberg *et al.*, Davis *et al.*, and Traversat *et al.*

Traversat *et al.* involves transaction management for computer network databases, and includes mechanisms for locking entries responsive to various conditions.⁶ Examiner has cited Traversat *et al.* for the proposition that it would be obvious to combine the teachings of the references for the purpose of providing a method for failure resolution in the event of an abort condition because it would provide maintenance and security for the integrity and stability of the configuration and transaction data in case of system failure or errors.

Traversat *et al.* is for client configuration databases in computer software and computer network applications.⁷ This is not SONET optical networks. As remarked herein, SONET configuration, management, etc. requires orders of magnitude more complexity due to the higher reliability requirements associated with the SONET protocol. No person skilled in the art would suggest that providing a method for failure resolution in a client configuration database is portable to a providing a method for failure resolution in SONET management.

⁶ U.S. Pat. No. 6,115,715, Abstract

⁷ U.S. Pat. No. 6,115,715, Col. 1, lines 14-17

Traversat *et al.* merely discloses a sequential process in which the top-most entry in a queue is read first, and then this is done for each entry in the event queue until all updates related to a transaction have been wiped out. In contrast, Appellant requires a transaction saving module and a recovery module. These modules are for saving the transmitted data for restoration to an object. Traversat *et al.* on the other hand deletes data when an operation is aborted. Further, Appellant respectfully submits that Traversat *et al.* does not supply any of the aforementioned deficiencies of Axberg *et al.* and Davis *et al.*

Respectfully submitted,

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/Christopher L. Bernard/

Christopher L. Bernard
Registration No.: 48,234

Lawrence A. Baratta Jr.
Registration No.: 59,553

Attorneys for Applicants

Clements | Bernard | Miller
1901 Roxborough Road, Suite 300
Charlotte, North Carolina 28211 USA
Telephone: 704.366.6642
Facsimile: 704.366.9744
cbernard@worldpatents.com